

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: ARC AIRBAG INFLATORS
PRODUCTS LIABILITY
LITIGATION

ALL CASES

Case No. 1:22-md-3051-ELR

MDL No. 3051

Judge Eleanor L. Ross

**PLAINTIFFS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO
HYUNDAI MOTOR COMPANY
AND KIA CORPORATION'S
MOTION TO DISMISS THE
CONSOLIDATED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(c)(1)(C), Plaintiffs hereby move for a 15-day extension of time, through and including October 15, 2024, for Plaintiffs to file their response to the motion to dismiss filed by defendants Hyundai Motor Company ("Hyundai Motor") and Kia Corporation ("Kia Corp.") on September 16, 2024. ECF 272.

In support thereof, Plaintiffs state as follows:

1. By stipulation dated June 12, 2024, Hyundai Motor and Kia Corp. (ECF 262), the corporate parents of automaker defendants Hyundai Motor America and Kia America, Inc., respectively, agreed to waive the formalities of service under the

Hague Service Convention in this litigation, and to accept service of Plaintiffs' Corrected Consolidated Class Action Complaint, in exchange for certain accommodations on any discovery (ECF 157). The Court approved the stipulation on June 14, 2024 (ECF 264), Plaintiffs served the Complaint on June 16, 2024, and, per the stipulation, these defendants timely moved to dismiss the Complaint on September 16, 2024. ECF 272.

2. Pursuant to Rule 7.1(B) of the Local Rules of the Northern District of Georgia, Plaintiffs' response is due 14 days after service of the motion, or on September 30, 2024. LR 7.1(B), NDGa.

3. Hyundai Motor and Kia Corp.'s motion to dismiss is the first such motion filed by foreign corporate parents of U.S. defendants in this litigation. As such, Plaintiffs expect their response will raise certain legal and factual issues not previously addressed in the Parties' briefing on the U.S. defendants' motions to dismiss. Plaintiffs thus believe they will require additional time to prepare their response to Hyundai Motor and Kia Corp.'s motion.

4. Plaintiffs met and conferred with counsel for Hyundai Motor and Kia Corp., and they do not oppose this Motion.

5. This Motion is submitted in good faith and not intended to cause unnecessary burden or needless expense.

6. Plaintiffs have not previously requested an extension to respond to Hyundai Motor and Kia Corp.'s motion to dismiss.

Therefore, for good cause shown, Plaintiffs respectfully request that the Court enter an Order extending the deadline for Plaintiffs to respond to Hyundai Motor and Kia Corp.'s motion to dismiss by 15-days, from September 30, 2024 through and including October 15, 2024.

A proposed order granting this relief is attached.

Dated: September 18, 2024

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LOCAL RULE 7.1(D) CERTIFICATION

Pursuant to Local Rule 7.1(D), I hereby certify that this document has been prepared in Times New Roman, 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1(C).

This 18th day of September, 2024.

Demet Basar
*Counsel for Plaintiffs
and the Proposed Classes*

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

This 18th day of September, 2024.

Demet Basar
*Counsel for Plaintiffs
and the Proposed Classes*